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Hon. Andrew J. Peck
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

March 1, 2012

MEMO ENDORSED 3/1/12
REQUEST DENIED.

SO ORDERED:

Hon. Andrew Jay Peck
United States Magistrate Judge

BY ECF

Re: da Silva Moore, et al. v. Publicis Groupe SA, et al.
Case No. 11-CV-1279

Dear Judge Peck:

We represent Defendant MSLGroup Americas, Inc. In light of Plaintiffs' pending Objection to the Court's rulings regarding the ESI Protocol, the parties jointly request that the Court adjourn the status conference scheduled for March 9, 2012 at 9:30 a.m. and stay the execution of the ESI Protocol pending Judge Carter's decision. Given the significant costs associated with executing the ESI Protocol, the parties wish to avoid having to conduct it twice, should Judge Carter modify the Court's rulings in any way. Additionally, because the purpose of the status conference is to discuss the progress regarding the execution of the ESI Protocol, the parties request that the conference be rescheduled for two weeks after Judge Carter rules on the pending Objection to the ESI Protocol.

Thank you for your attention to this matter.

Respectfully yours,

JACKSON LEWIS LLP



Jeffrey W. Brecher

JWB/mf

cc: All counsel of record (via email)